

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

|                           |   |                    |
|---------------------------|---|--------------------|
| UNITED STATES OF AMERICA, | : |                    |
|                           | : |                    |
|                           | : |                    |
| v.                        | : | File No. 1:22CR303 |
|                           | : |                    |
| FREDDIE WAYNE HUFF, II,   | : |                    |
|                           | : |                    |
| Defendant                 | : |                    |

**MOTION FOR EXTENSION OF TIME IN WHICH TO FILE**  
**OBJECTIONS TO DRAFT PRE-SENTENCE REPORT**

NOW COMES the Defendant, Freddie Huff, II, through counsel, and moves the Court to enter an order allowing the Defendant two additional weeks in which to file his objections to the draft pre-sentence report and in support of this motions shows unto the Court the following:

1. That the Defendant has been incarcerated pre-trial in Piedmont Regional Jail for several months.
2. That during that time, the Defendant has been in and out of local hospitals due to his seizure disorder and Parkinson's Disease.
3. That scheduling calls with the Defendant has been nearly impossible because of these frequent trips to the hospital and the wait times to get on the schedule.

4. That counsel has consulted with Assistant United States Attorney, Randall Galyon, and he consents to this motion.

5. That the Defendant submits that the requested extension is for "the reasonable time necessary for effective preparation, taking into account the exercise of due diligence." 18 U.S.C. 3161(h)(7)(b)(iv). The Defendant further submits that the ends of justice are best served by granting this extension, and that they outweigh the interest of the public and the Defendant in a speedy trial. Accordingly, the delay occasioned by the granting of this extension should be excluded in computing the time within which the trial of any such offense must commence. 18 U.S.C. 3161(h)(7)(A).

6. That the Government be given equal time and a commensurate extension of deadlines to mirror the extension given to the Defendant.

7. This request is not made for the purposes of delay and is in the interests of justice.

WHEREFORE, the Defendant respectfully requests an additional week within which to file objections to the draft pre-sentence report and for such and further relief the Court shall deem just and proper.

This the 6th day of April, 2023.

/s/Christopher R. Clifton  
Christopher R. Clifton  
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UNITED STATES OF AMERICA, :  
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 FREDDIE WAYNE HUFF, II, :  
 :  
 Defendant :

We hereby certify that on April 6th, 2023, we electronically filed the foregoing MOTION TO EXTEND TIME IN WHICH TO FILE OBJECTIONS TO DRAFT PRE-SENTENCE REPORT with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Randall Galyon, Assistant United States Attorney.

/s/Christopher R. Clifton  
Christopher R. Clifton  
N.C. Bar No. 21981  
[cclifton@gtc-law.com](mailto:cclifton@gtc-law.com)

Case 1:22-cr-00303-CCE Document 35 Filed 04/06/23 Page 4 of 4